1 HARVEY P. SACKETT (72488)

2 **S A C K E T T**
   AND ASSOCIATES

3 A PROFESSIONAL LAW CORP.
   548 Market Street, Suite 38822

4 San Francisco, California 94104-5401
   Telephone: (408) 295-7755

5 Facsimile: (408) 295-7444
   Email: hps@sackettlaw.com

6
   /as

7
   Attorney for Plaintiff

8

9   UNITED STATES DISTRICT COURT

10   EASTERN DISTRICT OF CALIFORNIA

11 JULIA A. BARNETT,
)   Case No. 1:25-cv-00862-BAM
12   Plaintiff,   )
)
13 v.   )   STIPULATION AND ~~PROPOSED~~
)   ORDER
14   )
   FRANK BISIGNANO,   )
15 Commissioner of Social Security,)
)
16   Defendant.   )
)
17   )
)
18 _____)

19
           Plaintiff and Defendant, through their respective attorneys, hereby stipulate that

20 Plaintiff shall have a twenty-one (21) day extension of time until December 3, 2025, in which to

21 e-file her Motion for Summary Judgment which is due on November 12, 2025. Defendant shall

22 file any opposition, including cross-motion, on or before January 2, 2026. This second and final

23 extension is necessitated due to the number of cases Plaintiff's counsel must brief for this court

24 and the Ninth Circuit Court of Appeals, coupled with staff shortages due to illness or vacation.

25 Plaintiff makes this request in good faith with no intention to unduly delay the proceedings.

26 Defendant has no objection and has stipulated to the requested relief.

27

28

SACKETT
AND ASSOCIATES
A PROFESSIONAL LAW CORP.
548 Market Street, Suite 38822
San Francisco, CA 94104-5401
(628) 204-4644
(408) 295-7755

                                    1

STIPULATION AND ORDER

1   Dated: November 5, 2025   /s/HARVEY P. SACKETT

2   HARVEY P. SACKETT
                                             Attorney for Plaintiff
3   JULIA A. BARNETT

4   Dated: November 5, 2025   /s/OSCAR GONZALEZ DE LLANO

                                             OSCAR GONZALEZ DE LLANO
5   Special Assistant U.S. Attorney
                                             Social Security Administration
6   [*As authorized by email 11/5/25]

7

8   ORDER

9   Pursuant to the parties' stipulation, and cause appearing, Plaintiff shall have an extension

10   of time to December 3, 2025, to file her Motion for Summary Judgment. Defendant shall file

11   any opposition on or before January 2, 2026. All other deadlines in the Court's Scheduling

12   Order are modified accordingly.

13
     IT IS SO ORDERED.
14

15   Dated: **November 6, 2025**   /s/ Barbara A. McAuliffe

16   UNITED STATES MAGISTRATE JUDGE

17

18

19

20

21

22

23

24

25

26

27

28

                                        2

STIPULATION AND ORDER